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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- And -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

☐ Affect both Debtors

Case No. 19-30088 (DM)
(Jointly Administered)

Chapter 11

**DECLARATION OF JEREMY C.
KLEINMAN IN SUPPORT OF
PEPSICO, INC. MASTER TRUST'S
RESPONSE TO REORGANIZED
DEBTORS' ELEVENTH SECURITIES
CLAIMS OMNIBUS OBJECTION
(CLAIMS BARRED BY THE
STATUTE OF REPOSE)**

Jeremy C. Kleinman declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am a lawyer at the law firm FrankGecker LLP ("FrankGecker"), counsel for the PepsiCo, Inc. Master Trust (the "PepsiCo Trust") in the chapter 11 cases (the "Cases") of PG&E


1 Corp. *et al.* (collectively, the “**Debtors**”).

2 2. I submit this Declaration in support of the PepsiCo Trust’s response to Reorganized
3 Debtors’ Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)
4 (the “**Omnibus Objection**”).

5 3. On or about April 9, 2020, I caused to be filed the PepsiCo Trust’s Claim No. 98712
6 (the “**Claim**”), using the agreed-upon form of proof of claim form for equity securities and debt
7 securities-based claims in the Cases, which did not require claimants to separately identify the
8 specific statute(s) under which it sought relief. A copy of Claim is attached hereto as Exhibit A.
9

10 4. The Claim is covered by Section 10(b) of the Securities Exchange Act of 1934 (the
11 “Exchange Act”) (*see* 15 U.S.C. § 78j) and Rule 10b-5 promulgated thereunder by the U.S.
12 Securities and Exchange Commission and was filed prior to the expiration of any statute of
13 limitation or repose.
14

15 Executed this 8th day of September, 2021 in Chicago, Illinois.

16 
17 Jeremy C. Kleinman